

Robert M. Holley (SBN 50769) 1 Attorney at law 2 State Bar No. 50769 331 J Street, Suite #200 3 Sacramento, California 95814 Telephone: (916) 443-2213 4 5 Attorney for Defendant Leonard Williams 6 IN THE UNITED STATES DISTRICT COURT 7 EASTERN DISTRICT OF CALIFORNIA 8 9 10 UNITED STATES OF AMERICA,) NO. CR-S-05-106 GEB Plaintiff,) STIPULATION AND [PROPOSED] 11) ORDER CONTINUING STATUS) CONFERENCE AND EXCLUDING 12 v. TIME 13 LEONARD WILLIAMS, Friday, April 13, 2007) Date: 14 Defendant.) Time: 9:00 a.m. Judge: Garland E. Burrell, Jr. 15 16

BACKGROUND AND DECLARATION OF COUNSEL

At the last hearing, this status conference was scheduled to be heard on Friday, March 30, 2007 at 9:00 a.m. The status of this case is that we are close to a plea agreement but are in the process of possibly working out a stipulation regarding evidentiary guideline matters. It is taking time but we hope to have an agreement in the hands of the Court before April 13, 2007.

For the convenience of the Court and all parties we are requesting this continuance by Stipulation and Order without the necessity of appearance.

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The balance of the court appearances are requested to be independent from the other named defendants because of $5\,\mathrm{K}$ considerations.

I declare under penalty of perjury that the foregoing is true and correct. Signed at Sacramento, California on March 27, 2007.

/s/ Robert M. Holley

Robert M. Holley, Esq. Counsel for Mr. Williams

STIPULATION

It is hereby stipulated by and between the defendant, Leonard Williams, through his counsel, Robert M. Holley, Esq., and the United States, through its counsel, Assistant United States Attorney Ken Melikian, Esq., that the status conference presently scheduled for Friday, March 30, 2007 be continued without appearance, for two weeks to Friday, April 13, 2007 at 9:00 a.m.

The parties further stipulate that time included in this continuance be excluded pursuant to Speedy Trial Act, 18 U.S.C. Section 3161(h)(8)(B)(ii)(Local Codes T2 and T4) until April 13, 2007 due to complexity of the case and in the interest of justice to allow the defense to consider and negotiate an appropriate plea bargain.

Dated: January 17, 2007

/s/ Robert M. Holley

Mr. Robert M. Holley, Esq. Counsel for Mr. Williams

/s/ Robert M. Holley for

Mr. Ken Melikian, Esq. Assistant U.S. Attorney Per telephonic authority

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[PROPOSED] ORDER In the Case of <u>U.S. v. Leonard Williams</u>, Cr-S-05-106 GEB, **GOOD** CAUSE APPEARING and upon the stipulation of the parties, IT IS HEREBY ORDERED THAT the status conference presently set for Friday, March 30, 2007 at 9:00 a.m. be continued to Friday, April 13, 2007 at 9:00 a.m. It is further ordered that time be excluded through April 13, 2007 pursuant to the Speedy Trial Act exclusion sections set forth in the stipulation above. Dated: March 27, 2007 United States District Judge